## Exhibit A

## Trump Alioto Trump & Prescott

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December 3, 2012

## **VIA ELECTRONIC MAIL**

John Taladay, Esq. Baker Botts L.L.P. The Warner Building 1299 Pennsylvania Ave., N.W. Washington, D.C. 20004

Re: In Re: Cathode Ray Tubes (CRT) Antitrust Litigation,

**MDL No. 1917** 

Dear John:

Pursuant to the Order Re Discovery And Case Management Protocol dated April 3, 2012, Indirect Purchaser Plaintiffs, Individual Action Plaintiffs, and the State of Florida (collectively, "Plaintiffs") have continued to work together to discuss Koninklijke Philips Electronics N.V. ("KPE") and Philips Electronics North America Corporation ("PENAC") (collectively "Philips") employees regarded as potential merits deponents.

Currently, Plaintiffs' expectations are to notice depositions to take place in San Francisco, CA beginning in January/February of next year. Please inform us of any conflicts or other issues that may preclude these individuals from attending depositions during those calendar months. We anticipate the following six individuals to be the first Philips employees noticed for deposition:

- 1. Milan Baran
- 2. David Chang
- 3. Rosa Hu
- 4. Jerry Lin
- 5. Dong Liu
- 6. Jim Smith

As we move forward, Plaintiffs anticipate the individuals most likely to be deposed will come from the following list of names:

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Ney Corsino

Rik Dombrecht

Jeffrey Johnson

G.J. Kleisterlee

Jan Van Knippenberg

S.K. Lee

Si-Quan Li

Xiu-Hua Li

Limay Liu

Bing Ma

Leo Mink

J.K. Park

Jeff Pos

Cor Saris

Reinoud Selbeck

Xheng-Xi ("Frank") Shao

Jian-Zhong Sheng

Yu-Zong Song

Y.T. Sung

Zheng-Fu ("Sam") Tian

Lawrence Wadsworth

Yi Wang

Ming-Hui Xu

Yeong-Ug ("Albert") Yang

Please inform us if any of the above listed individuals are no longer employees of Philips so that we may arrange for the appropriate means of service. In addition, please inform us if any of the above individuals intend to invoke their rights under the Fifth Amendment.

Plaintiffs reserve the right to supplement this list depending on Philips' response and on information obtained during the discovery process. If you believe that any of the listed persons do not have relevant knowledge, or only marginal knowledge, of the relevant facts, please let us know. Thank you for your attention to this matter and we look forward to speaking with you in the near future.

Sincerely,

/s/ Mario N. Alioto

Trump Alioto Trump & Prescott, LLP Interim Lead Counsel for the Indirect Purchaser Plaintiffs

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Cc: Nathan Cihlar

John Bogdanov Liz Brady

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Phil Iovieno